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1 2 3 4 5	STANLEY GOFF (Bar No. 289564) LAW OFFICE OF STANLEY GOFF 15 Boardman Place Suite 2 San Francisco, CA 94103 Telephone: (415) 571-9570 Email: scraiggoff@aol.com Attorney for Plaintiff
6 7 8	WILLIAM J. BITTNER Associate Attorney Angelo, Kilday & Kilduff, LLP 601 University Avenue, Suite 150 Sacramento, CA 95825
9 10	Attorney for Defendants
11 12 13	UNITED STATES DISTRICT COURT EASTERN DISTRICT OF CALIFORNIA
114	QUIANA PORTER, Plaintiff, vs. STIPULATION FOR ORDER EXTENDING TIME TO DEPOSE DEFENDANT HANSON ONLY; AND ORDER HANSEN, et al, Defendant.
22 23	

TO THE COURT, ALL PARTIES, AND THEIR ATTORNEYS OF RECORD:

Plaintiff Quiana Porter, by and through her counsel, and Defendants, by and through their counsel, submit the following stipulation and request for an extension to extend the Plaintiff's discovery deadline for the sole purpose of deposing Defendant Hansen, who is currently unavailable.

WHEREAS, Plaintiff's attorney has noticed the deposition of Defendant Hansen, months before the fact discovery cutoff date of July 11, 2022.

WHEREAS, Defendants' attorney has informed Plaintiff's attorney that Defendant

Hansen is not available but that Defendants' attorney will work with Plaintiff's attorney to make

Hansen available to be deposed after the July 11, 2022 discovery cutoff deadline.

WHEREAS, today on record, Defendants' attorney again confirmed that Defendant

Hansen is not available but that Defendants' attorney will work with Plaintiff's attorney to make

Hansen available to be deposed as soon as Hansen is available.

WHEREAS, the parties have agreed to an extension to extend the Plaintiff's fact discovery deadline for the **SOLE** purpose to depose Defendant Hansen as soon as he is available to be deposed.

NOW, THEREFORE, the Parties hereby stipulate and request a Court order ordering that Plaintiff's fact discovery deadline for the **SOLE** purpose to depose Defendant Hansen as soon as he is available to be deposed be extended for the purpose of deposing Defendant Hansen **ONLY**.

IT IS SO STIPULATED.

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5	LAW OFFICE OF STANLEY GOFF
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7	Dated: July 11, 2022 /s/ Stanley Goff STANLEY GOFF Attorney for Plaintiff
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11	Dated: July 11, 2022/s/ William Bittner WILLIAM BITTNER
12	Attorney for Defendants
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14	ORDER Durguent to the parties' stimulation IT IS HEDERY OPDERED that plaintiff's factories.
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14 15 16	Pursuant to the parties' stipulation IT IS HEREBY ORDERED that plaintiff's factorized discovery deadline for the SOLE purpose to depose Defendant Hansen as soon as he is available to be deposed shall be extended for the purpose of deposing Defendant Hansen ONLY . DATED: September 9, 2022 /s/ DEBORAH BARNES
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